

## REMARKS

Claims 1-40 are pending and under consideration. Reconsideration is requested.

Independent claims 1, 5, 9, 13, 17, 21, 25, 29, 33 and 37 are rejected under 35 U.S.C. §103(a) as being unpatentable over Loudon et al. (U.S.P. 6,556,712) in view of Wolfe et al. (U.S.P. 6,037,930), and dependent claims 2-4, 6-8, 10-12, 14-16, 18-20, 22-24, 26-28, 30-32, 34-36 and 38-40 are rejected under 35 U.S.C. §103 (a) as being unpatentable over Loudon and Wolfe further in view of Maxted (U.S.P. 6,340,967). The rejections are traversed.

Independent claims 1, 9, 21, 25, and 29 respectively recite, a coordinate detection device and a writing device, using claim 1 as example, "calculating a distance between a final coordinate value of a previous operation and a beginning coordinate value of a current input operation by said input unit, the current input operation occurring after a detachment of the input device from the surface of said input unit during the immediately preceding previous input operation; and . . . setting, . . . a coordinate value at a time when the input device is detached from the surface of said input unit as the final coordinate value of the previous input operation."

Independent claims 5, 13, 21, 29, 33, and 37 respectively recite a method and a computer-readable recording medium including, using claim 5 as an example "calculating a distance between a final coordinate value of a previous operation and a beginning coordinate value . . . wherein the distance calculated by said calculating is transmitted to a host apparatus so as to prevent the current input operation from being connected to the previous input operation on a display."

### Recited Features Not Taught By Cited Art

The Action concedes that Loudon does not teach "calculating the distance between a final coordinate value of a previous operation and a beginning coordinate value of a current input operation, wherein the distance calculated by the calculation unit is transmitted to a host apparatus so as to prevent the current input operation from being connected to the previous operation on the display." (Action at page 3).

Applicant submits that such "calculating. . ." as recited by each of the independent claims is not taught by any of the cited art, alone or in combination with Loudon.

In support of the rejection, the Examiner refers to Wolfe's teaching in col. 8, lines 33-67 corresponding to a "mouse mode," and incorrectly concludes that the same operations in the mouse mode are performed in the absolute mode so that:

in the absolute mode, the distance (vector between the two coordinates) is used in an absolute mode to prevent the current input from being connected to previous

operation by designating the current X, T as the last coordinate point.  
(Action at page 3).

In support of this incorrect deduction, the Examiner merely indicates that "the step numbers in both figures 11 and 12 (of Wolfe) are similarly used." (Action at page 3).

Applicant respectfully submits the Examiner's reasoning is not correct. Rather, there is a need to calculate "the distance between a final coordinate value of a previous operation and a beginning coordinate value of a current input operation" in the absolute mode.

Further, Wolfe, itself, teaches (col. 5, lines 28-32) "In the absolute mode . . . each coordinate point on the pad corresponds to a point on the CRT screen."

That is the "mouse mode" taught by Wolfe is a relative mode not an absolute mode. Thus, the basis for the Examiner's rejection is not correct.

See, for example, an explanation of difference between the absolute mode and the relative mode (mouse mode), as understood in the art:

(a) conventional coordinate detection device employing the coordinate input panel includes two operation modes: an absolute coordinate value mode which outputs the coordinate value of an input point on the coordinate input panel one-to-one on a screen, and a relative coordinate value mode which outputs, as a movement, a difference between the respective coordinate values detected at previous and current sampling timings (hereinafter referred to as previous and current coordinate values, respectively.)

(Page 1, line 34 to page 2, line 7 of the specification of the present application)

Accordingly, features recited by each of the independent claims are not taught by even an *arguendo* combination of the cited art.

#### **Examiner's Contentions Not Supported**

In addition, in traverse of the Examiner's statement that a mouse mode is an absolute mode Applicant demands the Examiner produce authority for the statement since such support is not found in Wolfe.

If the Examiner also bases the rejection, at least in part, on personal knowledge, the Examiner is required under 37 C.F.R. § 1.104(d)(2) to support such an assertion with an affidavit when called for by the Applicant. Thus, Applicant calls upon the Examiner to support such assertion with an affidavit if further support is not provided.

#### **No Motivation To Combine The References**

Applicant further submits there is no motivation or reasonable chance of success to modify as the Examiner contends. As provided in MPEP §2144. 04:

(t)he mere fact that a worker in the art could rearrange the parts of the reference device . . . is not by itself sufficient to support a finding of obviousness. The prior art must provide a motivation . . . without the benefit of appellant's specification, to make the necessary changes in the reference device.

Loudon teaches a technique regarding handwriting recognition, and teaches that a particular object of solving a problem that the prior art:

is only useful for printed ideographies characters and cannot be used for cursively written ideographies characters where there is usually no pen lift between characters

and a problem that:

the prior art while providing certain benefits for handwriting recognition does not efficiently recognize cursively written ideographies characters in an on-line manner (for example, in an interactive manner).

(See, for example, col. 2, lines 34-37 and col. 2, lines 38-41).

Loudon teaches in col. 8, lines 19-46 input devices employed in the system. However, there is no particular discussion or teaching in Loudon to modify Loudon to "increase the versatilities of the device" as suggested by the Examiner. (Action at page 4).

On the other hand, Wolfe has a particular object of solving the problems of conventional pointing devices as described, for example, in col. 2, lines 41-65. That is Wolfe merely teaches a technique regarding a pointing device that is not used for inputting characters. Wolfe does not teach handwriting recognition.

Applicant submits that one of understanding in the art would not look to teachings of Wolfe to modify Loudon.

### **Summary**

Since features recited by the independent claims 1, 5, 9, 13, 17, 21, 25, 29, 33 and 37 (and respective dependent claims) are not taught by the cited art alone or in combination, there is no motivation to combine the art in a manner as suggested by the Examiner, the Examiner's contentions are not supported and *prima facie* obviousness is not established, the rejection should be withdrawn and claims 1-40 allowed.

### **CONCLUSION**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge

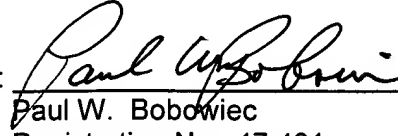
the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: November 18, 2005

By:

  
Paul W. Bobowiec  
Registration No. 47,431

1201 New York Ave, N.W., Suite 700  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501